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**IN THE UNITED STATES BANKRUPTCY COURT**  
**FOR THE DISTRICT OF WYOMING**

In re:	)	
DENNIS MEYER DANZIK,	)	
	)	Case No. 17-20934
	)	CHAPTER 11
Debtor.	)	

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**DEBTOR'S RESPONSE TO THE OBJECTION TO HIS MOTION FOR  
ALTERATION OR AMENDMENT OF AN ORDER OF THE COURT**

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COMES NOW the Debtor above named, by Ken McCartney of The Law Offices of Ken McCartney, P.C. and in response to the objection of the CWT parties to the Debtor's motion to alter or amend by entering a conversion order offers the following:

1. In paragraph number 20 and 21 of the objection, the CWT Parties clearly point out the manifest error that can be corrected by a simple conversion.
2. These paragraphs point out that the court has twice ruled that "any liquidation would be for the sole benefit of secured creditors."
3. Yet the objecting party is sitting on just short of \$500,000 with no liens against it, in the presence of a \$56,325.31 priority tax claim by the IRS, leaving just short of \$450,000 in liquid assets for the benefit of creditors.
4. This case has more than enough unencumbered cash in the bank to be one of the largest chapter 7 pro-rata payouts in the district this year.

5. This is not even close to a one creditor case and the court should consider fairness to all the claimants.

WHEREFORE, Applicant prays for the entry of an order converting this case to Chapter 7.

DONE this 28<sup>th</sup> day of February, 2019.

Respectfully submitted for the Debtor

By: /s/ Ken McCartney  
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**CERTIFICATE OF SERVICE**

The undersigned certifies that the forgoing was directly served on all E filers this 28<sup>th</sup> day of February, 2019.

/s/ Ken McCartney